page 10f 2

NOV - 3 2010

B. Braun Medical Inc. Response to FDA Request for Additional Information 510(k) K101882 Prontosan® Wound Gel

### 5. 510(k) SUMMARY

DATE:

October 15, 2010

SUBMITTER:

B. Braun Medical Inc. 901 Marcon Boulevard Allentown, PA 18109-9341

610-266-0500

Contact: Matthew J. Homa, Sr. Analyst, Regulatory Affairs

Phone: (610) 596-2558 Fax: (610) 266-4962

E-mail: matthew.homa@bbraun.com

**DEVICE NAME:** 

Prontosan® Wound Gel

**COMMON OR** 

**USUAL NAME:** 

Wound Cleanser, Wound Dressing

DEVICE

**CLASSIFICATION:** 

Class II, Product Code FRO, Unclassified

PREDICATE DEVICES:

Prontosan® Wound Gel, B. Braun Medical, Inc., K090141

Class II, FRO, Unclassified

Anasept® Antimicrobial Skin and Wound Gel, Anacapa Technologies, Inc., K073547, Class II, FRO, Unclassified

**DESCRIPTION:** 

Prontosan® Wound Gel is a clear, colorless and virtually odorless gel containing undecylenamidopropyl betaine, polyaminopropyl biguanide, glycerol, hydroxyethylcellulose and purified water. Prontosan Wound Gel is a non-pyrogenic solution used for wound management that is sterile by aseptic manufacturing until the product is first opened. PHMB is added to the product in the concentration of 0.1% w/w as a preservative to inhibit the growth of microorganisms within the product.

Prontosan Wound Gel will be offered in an over-the-counter (OTC) version and a professional use (Rx only) version. Prontosan Wound Gel is used to moisten the wound bed and clean the wound surface, including those that are difficult to access. Prontosan Wound Gel is aseptically filled into a 30 mL low density polyethylene squeeze bottle with a screw cap.

K101882 page 2042

B. Braun Medical Inc.
Response to FDA Request for Additional Information
510(k) K101882 Prontosan® Wound Gel

#### INTENDED USE:

OTC Use: Prontosan Wound Gel is intended to cleanse and moisten the wound bed and for the management of minor cuts, abrasion, laceration, and minor burns.

Professional Use: Prontosan Wound Gel is intended to cleanse and moisten the wound bed and for the management of ulcers, 1<sup>st</sup> and 2<sup>nd</sup> degree burns, partial and full thickness wounds, and surgical incisions. It can be used during wound dressing changes to soften encrusted wound dressings.

# SUBSTANTIAL EQUIVALENCE:

Two predicate devices are utilized for substantial equivalence, Prontosan® Wound Gel (K090141) and Anasept® Antimicrobial Skin and Wound Gel (K073547). Prontosan Wound Gel has an intended use similar to Anacapa Technologies' Anasept® Antimicrobial Skin and Wound Gel, i.e., to remove foreign matter, and Anasept® Antimicrobial Skin and Wound Gel is also labeled for OTC use.

Prontosan Wound Gel is the same product as in the original Prontosan Wound Gel submission, K090141. Both of these gels are comprised of the same ingredients and are processed and filled in the same manner. The biocompatibility and functional performance testing conducted on Prontosan Wound Gel in K090141 is applicable to this submission. The only difference between Prontosan Wound Gel, K090141, and this submission is the indications and intended use.

### **CONCLUSION:**

In-vitro testing was conducted to demonstrate the effectiveness of the preservative in Prontosan® Wound Gel and substantial equivalence with predicate device, Anasept® Antimicrobial Skin and Wound Gel. The non-clinical testing conducted with the proposed device demonstrates that the proposed device is as safe and effective as the predicate device.







Food and Drug Administration 10903 New Hampshire Avenue Document Control Room –WO66-G609 Silver Spring, MD 20993-0002

B. Braun Medical Inc.Mr. Matthew J. HomaSenior Analyst, Regulatory Affairs901 Marcon BoulevardAllentown, Pennsylvania 18109-9341

NOV = 3 2010

Re: K101882

Trade/Device Name: Prontosan® Wound Gel

Regulatory Class: Unclassified

Product Code: FRO

Dated: September 17, 2010 Received: September 20, 2010

-Dear-Mr.-Homa:--

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you; however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21)

## Page 2 - Mr. Matthew J. Homa

CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to <a href="http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm">http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm</a> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Mark N. Melkerson

Director

Division of Surgical, Orthopedic

And Restorative Devices

Office of Device Evaluation

Center for Devices and Radiological Health

Enclosure

4. INDICATIONS	S FOR USE STATEM	IENT				
	Page1 of1					
510(k) Number (if k	(nown): <u>K10</u>	1882				
Device Name:	Prontosan® Wound	Gel			NOV - 3	2010
Indications For Use	:					
	an Wound Gel is intend t of minor cuts, abrasion				and	
and for the manager	Prontosan Wound Gel is ment of ulcers, 1 <sup>st</sup> and 2 al incisions. It can be u essings.	2 <sup>nd</sup> degree bur	ns, partial and	full thickness		
Prescription Use (Per 21 CFR 801.10	<u>X</u> 19)	OR	Over-The-Cou	inter Use <u>X</u>	<u>,                                    </u>	
(PLEASE DO NOT IF NEEDED)	WRITE BELOW TH	IS LINE - CO	NTINUE ON	ANOTHER PA	<del>AGE</del>	
Concurrence of CD	RH, Office of Device E	Evaluation (Ol	DE)			

(Division Sign-Off)
Division of Surgical, Orthopedic,
and Restorative Devices

510(k) Number K101662